

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,)	
)	No. 18 C 3029
<i>Plaintiff,</i>)	
)	Hon. John Z. Lee,
<i>v.</i>)	District Judge
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Hon. M. David Weisman,
)	Magistrate Judge
<i>Defendants.</i>)	

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's order (Dkt. 268), the parties submit the following joint status report:

A. Confirmed Deposition Dates for all Third-Party Officer Depositions

The parties have scheduled the following depositions:

- Officer Joe Rodriguez - Deposition is scheduled for June 9.
- Evidence Tech Fogarty - Deposition is scheduled for June 15.
- Officer T. Coates - Deposition is scheduled for June 29.

B. Additional Third-Party Policer Officer Depositions

- Officer Motzny - The City is working on getting a date for Officer Motzny.
- Detective Bongiorno - The City is working on getting a date for Officer Bongiorno.
- Officer Ron Malczyk - The City is working on getting a date for Officer Malczyk.

- Evidence Tech Ferraeri - In lieu of a deposition, the parties are discussing the possibility of a stipulation for this witness.
- Crime Lab Officer Richard Chenow - Defendants have informed Plaintiff's counsel that Mr. Chenow is deceased.
- Sgt. E. Stack - The City is working on getting a date for Sgt. Stack.
- Lt. Farrell - The City is working on getting a date for Lt. Farrell.
- Officer D. Daley - Represented by Individual Defendants' counsel. They are working on a date.¹

Dated: May 24, 2021

Respectfully submitted,

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Halvorsen, as Special
Representative for
Ernest Halvorsen,
deceased, Wojcik,**

¹ Plaintiff first requested Sgt. Stack, Lt. Farrell, and Officer Daley on May 18, 2021.

**For Defendant City of
Chicago**

**McMurray, Figueroa,
and Biebel**

/s/ Megan K. McGrath
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**For Defendant
Guevara**

CERTIFICATE OF SERVICE

I, Sean Starr, an attorney, hereby certify that on May 24, 2021 I caused the foregoing Joint Status Report to be filed using the Court's CM/ECF system, thereby effectuating service on all counsel of record.

/s/ Sean Starr
Attorney for Plaintiff